

**REMARKS**

Claims 1-24 are all of the pending claims, with claims 1, 11 and 18 being written in independent form. By virtue of this Amendment, Applicant adds new claims 21-24 to recite various features of the invention.

**I. ALLOWABLE SUBJECT MATTER:**

At numbered paragraph 8 of the Office Action, the Examiner allows claims 1-10 and 15-20. Applicant respectfully submits that claims 21-24 are allowable by virtue of their dependencies from allowable claims 1 and 18.

**II. CLAIM REJECTIONS ON PRIOR ART GROUNDS:**

The Examiner rejects claim 11 under 35 U.S.C. § 102(b) as being anticipated by US 5,032,787 to Johnston et al. ("Johnston"), and claims 12-14 under 35 U.S.C. § 103(a) as being obvious over Johnston in view of US 6,586,956 to Aldaz et al. ("Aldaz"). Applicant respectfully traverses these rejections in view of the following remarks.

Independent claim 11 defines a method that involves (among other things) providing a connection unit including at least one contact pin with a barrel *"having a screw thread on an inside wall"* and *"a plunger with at least one screw coupled to the screw thread."* Further, when electrically connecting the tester and the semiconductor device, *"the at least one screw moves relative to the screw thread."* At least these features (as recited in independent claim 11), in combination with the other features recited in independent claim 11, are not taught or suggested by the prior art relied upon by the Examiner.

The Examiner looks to Johnston to teach each and every feature of the invention defined by claim 11. In so doing, the Examiner relies heavily upon the embodiment depicted in Fig. 1 and points out that during a probing operation, an external force applied to the tip of the plunger 30 causes the probe 28 to travel axially into the barrel 22 and rotate during this axial travel. Applicant respectfully disagrees with this rejection for the following reasons.

As shown in Fig. 1 of Johnston, the probe 28 includes the plunger 30 extending from the barrel 22 and a receptacle portion 36 provided inside the barrel 22. The end of the receptacle portion 36 is provided with a pilot hole 40. The pilot hole 40 receives the distal end of a guide member 54. The guide member 54 includes a helical configuration 64 that cooperates with the pilot hole 40 to impart a rotational movement to the probe 28 during a probing operation. More specifically, when the plunger 30 is cycled downwardly against a test point, the plunger 30 travels into the barrel 22. As the plunger 30 travels axially into the barrel 22, the receptacle portion 36 of the plunger 30 travels axially along the fixed guide member 54, and the helical configuration 64 of the guide member 54 travels through the pilot hole 40 of the receptacle portion 36. In this way, the pilot hole 40 follows the helical configuration 64 of the guide member 54, thereby rotating the plunger 30. However, in contrast to the claimed invention, the barrel 22 does *not* include a screw thread that is coupled to a screw of the plunger.

Applicant respectfully points out that as a result of the differences noted above, the method of claim 11 is less cumbersome than the probing technique disclosed by Johnston.

For these reasons, Applicant respectfully submits that independent claim 11 recites features that are practically and conceptually different than Johnston. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the raised anticipation rejection.

CONCLUSION

In view of the foregoing, Applicant respectfully requests reconsideration and allowance of each of claims 1-24.

If any matters need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number of the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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By

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